

EXHIBIT 3

 ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
EUGENIE BOUCHARD,

Plaintiff,

Docket No.
1:15-cv-5920

-against-

UNITED STATES TENNIS ASSOCIATION, INC. and
USTA NATIONAL TENNIS CENTER, INC.

Defendants.
-----x

150 East 42 Street
New York, New York

November 16, 2016
2:00 P.M.

EXAMINATION BEFORE TRIAL of KAREN
OWENS, the Defendant herein, taken by the
attorneys for the Plaintiff, pursuant to
Notice, and held before a Notary Public of the
State of New York at the above-stated time and
place.



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2 A P P E A R A N C E S:

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19 ALSO PRESENT:

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20 Rachel D. Booth, Esq. USTA

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1 KAREN OWENS

2 ahead.

3 A. No.

4 Q. Now, are you aware if there was a
5 warning sign down outside of the locker room
6 when Ms. Bouchard entered?

7 A. A caution sign.

8 Q. You saw -- did you see a caution
9 sign personally?

10 A. Yes.

11 Q. When did you see a caution sign
12 personally?

13 A. As soon as Christina finished.

14 Q. As soon as she finished spraying?

15 A. Yes.

16 Q. So, before you went to the front of
17 the locker room when Ms. Simmons finished,
18 you saw her put down a caution sign?

19 A. She put it down, yes.

20 Q. Where did she put it?

21 A. In front of the door.

22 Q. Inside the locker room?

23 A. No.

24 Q. I'm sorry.

25 A. Inside the trainer's room.



1 **KAREN OWENS**

2 Q. Okay. So the sign was -- withdrawn.

3 Can you please show for me on
4 Plaintiff's 1 where you saw the caution sign?

5 A. Right in front of the door.

6 Q. What did the caution sign look like?

7 A. It's a yellow and black.

8 Q. What did it say?

9 A. Caution.

10 Q. Did it say anything else?

11 A. No. I don't remember if there is
12 anything else but I know it's yellow and
13 black.

14 Q. After you spoke to Ms. Bouchard
15 about her fall and you had that conversation
16 about her falling, what did you do next?

17 A. It was nothing else I could do. She
18 wouldn't let me help her.

19 Q. My question is: What did you do
20 next?

21 A. Nothing. I just called my boss and
22 told her what happened.

23 Q. Who did you call?

24 A. Reiko.

25 Q. And what did Reiko say?

